

EXHIBIT 1

GIBSON DUNN

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October 11, 2020

VIA ELECTRONIC MAIL

Yonatan Even
Cravath, Swaine & Moore LLP
825 Eighth Avenue
New York, New York 10019

Re: *Cameron et al. v. Apple Inc.* (No. 19-cv-03074-YGR), *In re Apple iPhone Antitrust Litigation* (No. 11-cv-06714-YGR)

Dear Yonatan:

Pursuant to the January 9, 2020 Stipulated Protective Order entered by the Court in the above-titled actions, as well as the Stipulation between Epic Games, Inc. and Apple Inc. and Protective Order, entered by the Court on October 2, 2020, Defendant Apple Inc. (“Apple”) produces documents Bates-stamped, **APL-APPSTORE_00000001** through **APL-APPSTORE_09100216**, via a hard drive sent yesterday for delivery on October 12. The password will be sent separately via email.

The hard drive includes all document productions made to date in the above-titled actions. Please note that at Developer Plaintiffs’ request, we changed the name of the custodial metadata field from DesignatedCustodians to Custodian; however, it provides substantively the same information.

These productions were made subject to and without waiver of Apple’s Responses and Objections to the Consumer Plaintiffs’ First Set of Requests for Production, served on November 12, 2019, and Apple’s Responses and Objections to the Developer Plaintiffs’ First Set of Requests for Production, served on November 18, 2019. They are being re-produced now with the understanding that Epic Games may not litigate the decisions made in the above-titled actions that led to these productions, including but not limited to scope of responsiveness, confidentiality determinations, and privilege assertions. Apple, of course, remains willing to meet and confer with Epic Games related to their own ongoing and potentially forthcoming discovery disputes.

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Please let us know if you have any questions or issues accessing this production.

Sincerely,

Jay P. Srinivasan
JPS/hrsp